UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF)		
CARPENTERS PENSION FUND and its)		
Trustees RICHARD A. BAGGIO, ROGER A.)		
MONACO, PAUL R. HELLERMAN,)		
JEFFREY ISAACSON, BENJAMIN)		
JOHNSTON, J. DAVID PEPPER, ROBERT)		
QUANSTROM, MICHAEL J. SEXTON and)		
MARTIN C. UMLAUF; CHICAGO REGIONAL)		
COUNCIL OF CARPENTERS WELFARE)		
FUND and its Trustees RICHARD A. BAGGIO,)		
ROGER A. MONACO, PAUL R.)		
HELLERMAN, JEFFREY ISAACSON,)		
BENJAMIN JOHNSTON, FRANK LIBBY, J.)		
DAVID PEPPER, ROBERT QUANSTROM,)		
THOMAS S. RAKOW, MICHAEL J. SEXTON)		
and MARTIN C. UMLAUF; CHICAGO AND)	No.	07 C 7120
NORTHEAST ILLINOIS REGIONAL)		
COUNCIL OF CARPENTERS APPRENTICE)		
AND TRAINING PROGRAM and its Trustees)		
RICHARD A. BAGGIO, TODD H. HARRIS,)		
JEFFREY ISAACSON, KEITH JUTKINS,)		
ALBERT L. LEITSCHUH, RANDY R. MEYER,)		
BRUCE A. NELSON, J. DAVID PEPPER,)		
JAMES A. SIKICH AND MARTIN C. UMLAUF;)		
and LABOR/MANAGEMENT UNION)		
CARPENTRY COOPERATION PROMOTION)		
FUND and its Trustees RICHARD A. BAGGIO,)		
KENNETH BORG, JOSEPH FELDNER, J.)		
DAVID PEPPER, and MARTIN C. UMLAUF,)		
)		
Plaintiffs,)		
)		
v.)		
)		
SEATER CONSTRUCTION CO., INC., a)		
Wisconsin corporation,)		
)		
Defendant.)		

ANSWER TO COMPLAINT

NOW COMES the Defendant, Seater Construction Co., Inc., by its attorneys, McCarthy Duffy LLP, and in answer to the complaint filed herein by Chicago Regional Council of Carpenters Pension Fund *et al.*, states as follows:

- 1. Defendant admits the allegations in paragraph 1.
- 2. Defendant admits the allegations in paragraph 2.
- 3. Defendant admits the allegations in paragraph 3.
- 4. Defendant admits the allegations in paragraph 4.
- 5. Defendant admits the allegations in paragraph 5.
- 6. Defendant admits the allegations in paragraph 6.
- 7. Defendant admits the allegations in paragraph 7.
- 8. Defendant admits the allegations in paragraph 8.
- 9. Defendant admits the allegations in paragraph 9.
- 10. Defendant admits the allegations in paragraph 10.
- 11. Defendant admits the allegations in paragraph 11.
- 12. Defendant denies the allegations in paragraph 12.
- 13. Defendant denies the allegations in paragraph 13.
- 14. Defendant denies the allegations in paragraph 14.
- 15. Defendant denies the allegations in paragraph 15.
- 16. Defendant denies the allegations in paragraph 16.
- 17. Defendant denies the allegations in paragraph 17.
- 18. Defendant denies the allegations in paragraph 18.
- 19. Defendant admits the allegations in paragraph 19.
- 20. Defendant denies the allegations in paragraph 20.
- 21. Defendant denies the allegations in paragraph 21.

- 22. Defendant denies the allegations in paragraph 22.
- 23. Defendant denies the allegations in paragraph 23.
- 24. Defendant denies the allegations in paragraph 24.
- 25. Defendant denies the allegations in paragraph 25.
- 26. Defendant denies the allegations in paragraph 26.
- 27. Defendant admits the allegations in paragraph 27.
- 28. Defendant denies the allegations in paragraph 28.
- 29. Defendant denies the allegations in paragraph 29.
- 30. Defendant denies the allegations in paragraph 30.
- 31. Defendant denies the allegations in paragraph 31.
- 32. Defendant denies the allegations in paragraph 32.
- 33. Defendant denies the allegations in paragraph 33.
- 34. Defendant denies the allegations in paragraph 34.
- 35. Defendant admits the allegations in paragraph 35.
- 36. Defendant denies the allegations in paragraph 36.
- 37. Defendant denies the allegations in paragraph 37.
- 38. Defendant denies the allegations in paragraph 38.
- 39. Defendant denies the allegations in paragraph 39.
- 40. Defendant denies the allegations in paragraph 40.
- 41. Defendant denies the allegations in paragraph 41.
- 42. Defendant denies the allegations in paragraph 42.

WHEREFORE, Seater Construction Co., Inc. denies that Plaintiff is entitled to any relief whatsoever, and Defendant further prays that this Court dismiss the complaint with prejudice and grant Defendant its costs and such other relief as is just.

SEATER CONSTRUCTION CO., INC.

Bv:

One of its attornevs

Scott J. Gartner Attorney for Defendant McCarthy Duffy LLP 180 N. LaSalle Street Suite 1400 Chicago, IL 60601 (312) 726-0355